



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MKP
F. #2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 23, 2019

By Hand and ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.
Criminal Docket No. 18-204 (NGG) (S-2)

Dear Judge Garaufis:

The government respectfully writes in response to the defendants' letter submitting follow-up questions for voir dire, Dkt. No. 579. The government also notes that while it has not presently raised any cause challenges to the prospective jurors, the government respectfully reserves its right to challenge any of these jurors for cause at the appropriate time during oral voir dire.

The government respectfully requests that the Court inquire further regarding the following questions in addition to those identified in the defendants' letter:

#	Additional Question(s)
60	59
143	47
153	59
157	34
170	84(b)
177	30(d), 52

178	53
179	53, 59, 86, 95
181	60
188	77, 78(b)
189	81, 86
191	66
193	56

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
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cc: Clerk of Court (NGG) (by ECF)
Counsel of Record (by ECF)